

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Rec Room, Inc.,)	
)	
Plaintiff)	
)	Case No. 2:23-cv-01586
v.)	
)	
M: Z)	
)	
Defendant)	
)	

**AFFIDAVIT OF SERVICE UPON DEFENDANT
M Z**

Comes now Vladimir Raiman, who, upon oath, states the following:

1. I, Vladimir Raiman, am an agent of Axis Vero Incorporated (AVI), a Canadian Private Investigation Firm, and I am authorized to serve process in British Columbia (BC).
2. On Friday, October 27, 2023, I was instructed by Axis Geffen, President and Owner of Axis Vero Incorporated, himself instructed by Aaron Lukken, Esq. of Viking Advocates, LLC of Kansas City, Missouri, himself instructed by Mike Dunford, Esq., counsel for the plaintiff, to serve upon M Z (“MZ”) the following documents pursuant to Fed. R. Civ. P. 4(f)(2)(A), Article 10(b) of the Hague Service Convention, B.C. Sup. Ct. Rule 4-3(2)(e), and Section 48 of the B.C. Infants Act ¹:

¹ Applicable text, as related to me by Mr. Lukken:

Service if proceeding brought against infant

48 (1) In a proceeding against an infant, whether resident in British Columbia or not, service of the pleading or petition by which the proceeding was commenced must be made by serving it on a guardian resident in British Columbia.

(2) From the time of service the person served is guardian, for the proceeding, of the infant and must promptly attend to the infant's interests and do the things necessary to protect the infant's interests.

- Hague Service Convention "Warning"
- Hague Service Convention "Summary of the Document to Be Served"
- Summons in a Civil Action
- Complaint for Breach of Contract, Fraud, Copyright Infringement, and Other Claims
- Civil Cover Sheet
- Standing Order Regarding 28 U.S.C. § 455(b)(2) and Canon 3(C)(1)(B) of the Code of Conduct for United States Judges

3. Copies of the Warning and Summary pages are attached here as Exhibit A.

4. According to plaintiff's counsel, MZ's address is 22357 47A Ave., Langley, BC, V2Z 1M5.

5. Mr. Lukken advised that MZ is a minor, so I would need to serve one of MZ's parents, Olga Plotnikova and/or Sergei Zaitchikov, on his behalf. Mr. Lukken related to us a description of the mother, Ms. Plotnikova, as about 44, 5'5, green eyes, dark hair, about 130 pounds.

6. On Saturday, October 28, 2023 at 7:25pm, I attended the reported address with the intention of completing service upon the defendant's parent.

7. Upon my arrival, a woman answered the door who I identified as Ms. Plotnikova as she matched the description provided and she confirmed her name to me. I tried to hand her the above-listed documents, in order to comply with Mr. Lukken's instructions.

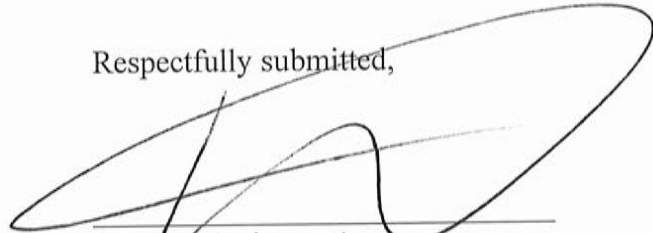
8. Ms. Plotnikova refused the documents. She became aggressive and rude and began yelling that she "refuse(d) to accept service and you'll just have to take it back!" I tossed the documents into her house through the open door and told her that legal service is not optional. She retrieved the documents and threw them back at me. I departed without further incident, leaving the documents behind.

9. Olga Plotnikova is described as mid to late 40's, approximately 5' 5" tall, 120-140lbs, green eyes, dark hair tied in a bun at her shoulders, wearing a long housecoat made of sweater-like material and speaking with a thick Eastern European accent.

10. I believe service in this matter to have been effected on October 28, 2023 according to the laws of the Province of British Columbia, thus in accordance with Article 10(b) of the Hague Service Convention.

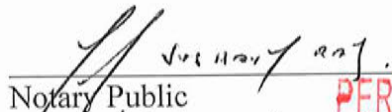
I swear that the foregoing statements are true to the best of my knowledge.

Respectfully submitted,



Vladimir Raiman, Agent
Axis Vero Incorporated
601 West Broadway, Suite 400,
Vancouver, British Columbia V5Z 4C2
Canada

Subscribed and sworn before me on November 27, 2023
at Vancouver, British Columbia.



Notary Public

My commission expires on _____.

PERMANENT COMMISSION

SUSHANT RAJ
NOTARY PUBLIC
FOR BRITISH COLUMBIA
202-2309 WEST 41ST AVENUE
VANCOUVER, B.C. V6M 2A3
604-263-9317

Sushant Raj
Notary Public for the Province
of British Columbia, Canada



EXHIBIT A

(Hague *Warning* and *Summary*)

This is Exhibit "A" referred to in the
affidavit of Vladimir Rainer
sworn before me at Vancouver
in the Province of British Columbia,
this 27 day of Nov, 2023.

.....
A Notary Public in and for the Province
of British Columbia, Canada

PERMANENT COMMISSION

SUSHANT RAJ
NOTARY PUBLIC
FOR BRITISH COLUMBIA
202-2309 WEST 41ST AVENUE
VANCOUVER, B.C. V6M 2A3
604-263-9317

Sushant Raj
Notary Public for the Province
of British Columbia, Canada

WARNING
AVERTISSEMENT

Identity and address of the addressee / Identité et adresse du destinataire

Langley BC V2Z 1M5

IMPORTANT

THE ENCLOSED DOCUMENT IS OF A LEGAL NATURE AND MAY AFFECT YOUR RIGHTS AND OBLIGATIONS. THE 'SUMMARY OF THE DOCUMENT TO BE SERVED' WILL GIVE YOU SOME INFORMATION ABOUT ITS NATURE AND PURPOSE. YOU SHOULD HOWEVER READ THE DOCUMENT ITSELF CAREFULLY. IT MAY BE NECESSARY TO SEEK LEGAL ADVICE.

IF YOUR FINANCIAL RESOURCES ARE INSUFFICIENT YOU SHOULD SEEK INFORMATION ON THE POSSIBILITY OF OBTAINING LEGAL AID OR ADVICE EITHER IN THE COUNTRY WHERE YOU LIVE OR IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED.

ENQUIRIES ABOUT THE AVAILABILITY OF LEGAL AID OR ADVICE IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED MAY BE DIRECTED TO:

TRÈS IMPORTANT

LE DOCUMENT CI-JOINT EST DE NATURE JURIDIQUE ET PEUT AFFECTER VOS DROITS ET OBLIGATIONS. LES « ÉLÉMENTS ESSENTIELS DE L'ACTE » VOUS DONNENT QUELQUES INFORMATIONS SUR SA NATURE ET SON OBJET. IL EST TOUTEFOIS INDISPENSABLE DE LIRE ATTENTIVEMENT LE TEXTE MÊME DU DOCUMENT. IL PEUT ÊTRE NÉCESSAIRE DE DEMANDER UN AVIS JURIDIQUE.

SI VOS RESSOURCES SONT INSUFFISANTES, RENSEIGNEZ-VOUS SUR LA POSSIBILITÉ D'OBTENIR L'ASSISTANCE JUDICIAIRE ET LA CONSULTATION JURIDIQUE, SOIT DANS VOTRE PAYS, SOIT DANS LE PAYS D'ORIGINE DU DOCUMENT.

LES DEMANDES DE RENSEIGNEMENTS SUR LES POSSIBILITÉS D'OBTENIR L'ASSISTANCE JUDICIAIRE OU LA CONSULTATION JURIDIQUE DANS LE PAYS D'ORIGINE DU DOCUMENT PEUVENT ÊTRE ADRESSÉES À :

Legal Foundation of Washington
1325 4th Avenue
Seattle, Washington 98101
Tel.: +1.206.624.2536

It is recommended that the standard terms in the notice be written in English and French and where appropriate also in the official language, or in one of the official languages of the State in which the document originated. The blanks could be completed either in the language of the State to which the document is to be sent, or in English or French.

Il est recommandé que les mentions imprimées dans cette note soient rédigées en langue française et en langue anglaise et le cas échéant, en outre, dans la langue ou l'une des langues officielles de l'État d'origine de l'acte. Les blancs pourraient être remplis, soit dans la langue de l'État où le document doit être adressé, soit en langue française, soit en langue anglaise.

SUMMARY OF THE DOCUMENT TO BE SERVED

ÉLÉMENTS ESSENTIELS DE L'ACTE

Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, signed at The Hague, the 15th of November 1965 (Article 5, fourth paragraph).
 Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Haye le 15 novembre 1965 (article 5, alinéa 4).

Name and address of the requesting authority: Nom et adresse de l'autorité requérante :	Aaron D. Lukken, Attorney Viking Advocates, LLC 6525 Charlotte Street Kansas City, Missouri 64131 USA E.: lukken@vikinglaw.us Tel.: +1.816.683.7900
Particulars of the parties*: Identité des parties* :	Plaintiff: Rec Room, Inc. Defendant:

* If appropriate, identity and address of the person interested in the transmission of the document
 S'il y a lieu, identité et adresse de la personne intéressée à la transmission de l'acte

☒ **JUDICIAL DOCUMENT****
 ACTE JUDICIAIRE**

Nature and purpose of the document: Nature et objet de l'acte :	To notify the defendant of a lawsuit against him, and to demand his answer at court.
Nature and purpose of the proceedings and, when appropriate, the amount in dispute: Nature et objet de l'instance, le cas échéant, le montant du litige :	Plaintiff accuses the defendant of, <i>inter alia</i> , fraud and tortious interference with contract. It seeks injunctive relief, damages, costs, fees, and interest.
Date and Place for entering appearance**: Date et lieu de la comparution** :	Within 21 days after service the addressee must enter an appearance at the United States District Court, Western District of Washington, 700 Stewart Street, Seattle, Washington 98101.
Court which has given judgment**: Juridiction qui a rendu la décision** :	No court has issued a judgment.
Date of judgment**: Date de la décision** :	No court has issued a judgment.
Time limits stated in the document***: Indication des délais figurant dans l'acte** :	21 days

** if appropriate / s'il y a lieu